

BUREAU OF SOLID WASTE MANAGEMENT
407 South Cameron Street
Harrisburg, Pennsylvania 17101
(717) 787-9697
May 4, 1984

Not Indicated
2/14/83
Hank Schofield

~~RECEIVED~~
MAY 9 1984
WATER
PERMITS BRANCH

RECEIVED
Facilities Management Section

MAY 21 1984

U.S. EPA, Region III

Mr. Robin E. Thomas, Manager
Chemistry Laboratory
Hamilton Technology, Inc.
P.O. Box 4787
Lancaster, PA 17604

Re: Part B Permit Application
ID # ~~PA000000000000000000~~
~~PA000000000000000000~~

Dear Mr. Thomas:

In the process of preparing a draft permit for the Environmental Protection Agency (EPA) for your above referenced facility, we have found that information on the following items is either missing or is unsatisfactory:

1. Section 264.176. - Special requirements for ignitable or reactive wastes. This regulation requires that containers holding ignitable or reactive waste must be located at least fifteen (15) meters (50 feet) from the facility's property line. The location plan of the storage facility within the building shows that it meets the requirement on three sides. However, on the North side the storage facility abuts the building wall and does not meet the required 50 foot distance condition.
2. Section 264.142(d). The closure cost estimate for the facility must be adjusted for inflation within thirty (30) days after each anniversary of the date on which the first closure cost estimate was prepared. For further details, please refer to the required section in the Federal Register, 40 CFR 260.
3. Section 264.34. Please provide details of internal alarm or emergency communication devices within the plant. The regulation requires that all personnel involved in the handling of hazardous wastes must have immediate access to an internal alarm or emergency communication device.


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4. Section 264.37. It is not clear whether the hospitals, the City fire department, and City police have been familiarized with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, entrances to facility, and possible evacuation routes. Arrangements must be made to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses that could result. Where state or local authorities decline to enter into such arrangements, this must be documented.
5. Section 264.53. Copies of contingency plan and all revisions must be submitted to all local police departments, fire departments, hospitals and state and local emergency response teams.
6. Section 264.143. Financial assurance for closure of the facility should be provided. Please refer to this section for several options available.

Please provide the above listed information within fifteen (15) days of receipt of this letter. If the information is already included in the Part 3 application, please indicate the page number and volume where it can be found. Upon receipt of this information, we will forward the draft permit to EPA in Philadelphia for their review.

Very truly yours,

Abdul R. Merchant
Sanitary Engineer
Harrisburg Regional Office


ARM:jrm

cc: U.S. Environmental Protection Agency